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December 28, 1993

RECEIVED
 Dec 28 '93
 FEDERAL COMMUNICATIONS
 COMMISSION
 OFFICE OF THE
 SECRETARY

Mr. Gregory J. Vogt
 Chief, Tariff Division
 Common Carrier Bureau
 Federal Communications Commission
 1919 M Street, N.W.
 Washington, D.C. 20554

RE: Local Exchange Carrier's Rates, Terms, and Conditions for Expanded Interconnection
 for Special Access, CC Docket No. 93-162, Phase I.

Dear Greg:

The Association for Local Telecommunications Services ("ALTS"), by its attorneys, requests the Common Carrier Bureau ("Bureau") to clarify the filing date for oppositions to the Petition for Reconsideration of Bellsouth Telecommunications ("Bellsouth Petition"), filed December 13, 1993, in the above-captioned proceeding. The Bellsouth Petition seeks reconsideration of the Commission's First Report and Order in CC Docket 93-162, in which the Commission, after suspending and investigating the local exchange carriers' ("LECs") expanded interconnection tariffs, prescribed interim rates for the LECs expanded interconnection services.

It is unclear what procedural rules govern the continuing tariff investigation. Specifically, it is not apparent when parties are required to file oppositions to the Bellsouth Petition. The Bureau explicitly stated that the investigation of LECs' rates, terms, and conditions for special access would be conducted as a notice and comment proceeding. Local Exchange Carrier's Rates, Terms, and Conditions for Expanded Interconnection for Special Access, CC Docket No. 93-162, Phase I, 8 FCC Rcd 6909, 6928 (1993). Thus, ALTS expects that the Bureau will put the Bellsouth Petition on public notice pursuant to 47 C.F.R. § 1.429(e), and oppositions shall be filed within 15 days after the date of public notice pursuant to 47 C.F.R. § 1.429(f).

However, ALTS has been informally advised by staff of the Common Carrier Bureau and the Office of General Counsel that the petition may not be put on public notice and might be considered under other unspecified rules that entail a ten day opposition filing period commencing when the petition is filed. Under this interpretation, an opposition to the Bellsouth Petition is due December 29, 1993. 47 C.F.R. § 1.4(h).

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In view of the uncertainty surrounding the procedural rules applicable to this investigation, ALTS requests an informal clarification of the filing deadline for oppositions to the Bellsouth Petition. ALTS intends to file an opposition 15 days after the Bureau puts the Bellsouth Petition on public notice. In the event that the Bureau determines that the proper filing period for oppositions is ten days after the petition is filed, ALTS seeks (a waiver and) an extension of time to file an opposition ten days from the date of the Bureau's determination.

Questions regarding ALTS's request may be directed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Theodore Pierson, Jr.", with a stylized flourish at the end.

W. Theodore Pierson, Jr.

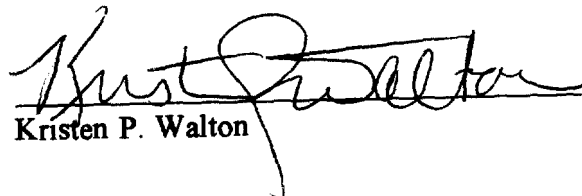
Counsel to the Association for
Local Telecommunications Services

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of December 1993, the foregoing letter of the ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES was served upon:

M. Robert Sutherland
Richard M. Sbaratta
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by overnight courier and on the parties on the attached service list by first-class mail , post pre-paid or by hand delivery*.


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